

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

ERIKA SUSAN PERDUE,
Defendant.

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No. 3:12-CR-134-L

E.C.F.

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE COURT:

Defendant Erika Susan Perdue respectfully moves this Court for a continuance of the trial and associated dates in this case, and in support presents the following:

1. The Court has entered a Scheduling Order in this case setting the deadline for Motions on November 26, 2102, responses on December 10, 2012, and trial on January 22, 2013.
2. The defense requests this continuance in the interests of justice. Counsel spoke with Assistant United States Attorney Camille E. Sparks who stated that the government does not oppose this motion.
3. Should the Court grant the requested continuance, the defense agrees that any period of delay resulting therefrom, made necessary by this request for continuance, shall be excludable under 18 U.S.C. § 3161(h)(7)(A). Additionally, the ends of justice served by the granting of this continuance outweigh the best interests of the public and the Defendant in a speedy trial, 18 U.S.C. § 3161(h)(7)(A).
4. The defense requests a continuance of at least 60 days from the current trial date.

WHEREFORE, Defendant Perdue respectfully asks the Court to grant this Motion for Continuance.

Respectfully submitted,

/s/ Deborah Goodall

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Attorneys for Defendant
Erika Susan Perdue

CERTIFICATE OF CONFERENCE

I certify that I spoke with AUSA Camille Sparks about this Motion and the grounds therefor, and she expressed no objection to the Court's granting a continuance.

/s/ Deborah Goodall
DEBORAH GOODALL

CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2012, I caused a copy of the foregoing Motion to be delivered to the Honorable Sam A. Lindsay, United States District Judge, Northern District of Texas; and Assistant United States Attorney Camille E. Sparks, at 1100 Commerce Street, Dallas, Texas, 75202.

/s/ Deborah Goodall
DEBORAH GOODALL